

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Qwest Communications International Inc.)	WC Docket No. 02-314
)	
Consolidated Application for Authority)	
to Provide In-Region, InterLATA Services)	
in Colorado, Idaho, Iowa, Montana, Nebraska,)	
North Dakota, Utah, Washington, and Wyoming))	

REPLY DECLARATION OF DANA L. FILIP

**Checklist Item 2 of Section 271(c)(2)(B)
Operations Support Systems
(Change Management)**

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TABLE OF EXHIBITS

Reply Exhibit	Description
DLF-1	Change Management Process (CMP) for Local Services (October 15, 2002) (“CMP Framework”)
DLF-2	Change Management Improvements Matrix (September 30, 2002)
DLF-3	PROS.08.15.02.F.00544.LSOG 5 Updates
DLF-4	PROS.08.16.02.F.00548.Ordering Overview

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**Checklist Item 2 of Section 271(c)(2)(B)
Operations Support Systems
(Change Management)**

Pursuant to 47 C.F.R. § 1.16, Dana L. Filip declares as follows:

1. My name is Dana L. Filip. I am the same Dana L. Filip who filed the June 13, 2002, Declaration on Change Management accompanying the Application in the Qwest I proceeding, WC Docket No. 02-148 (“Qwest I CMP Declaration”); the July 12, 2002, Declaration on Change Management accompanying the Application in the Qwest II proceeding, WC Docket No. 02-189 (“Qwest II CMP Declaration”); and the August 26, 2002, declaration accompanying Qwest’s reply comments in the Qwest II proceeding (“Qwest II CMP Reply

Declaration”).¹ I am the Senior Vice President – Global Service Delivery (Wholesale) at Qwest Communications. My business address is 555 17th Street, Denver, Colorado, 80202. I am responsible for leading the Change Management Process (“CMP”) at Qwest, and my organization has led the collaborative CLEC/Qwest CMP redesign process. A description of my professional experience and education is included as Exhibit DLF-CMP-1 to my initial Declarations in Qwest I and Qwest II.

I. PURPOSE OF DECLARATION

2. The purpose of my declaration is to respond to certain claims made by parties filing comments on Qwest’s September 30 Application for interLATA authority for the states of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington, and Wyoming (“Qwest III”). The issues I address include: (1) Qwest’s pattern of compliance with the redesigned CMP; and (2) allegations by WorldCom in its Qwest II Reply Comments regarding compliance with notification provisions under the CMP. At the outset, I also provide a brief update on the completion of the CMP redesign process.

¹ Judith M. Schultz was the author of the declaration accompanying Qwest’s reply comments in the Qwest I proceeding (“Qwest I CMP Reply Declaration”).

II. COMPLETION OF CLEC/QWEST REDESIGN PROCESS

3. The Qwest I and Qwest II CMP Declarations describe in detail the collaborative CLEC/Qwest CMP redesign process.² This effort, which began over a year ago, was already largely completed when Qwest filed its first Section 271 application on June 13, 2002. As stated in the Qwest I CMP Reply Declaration, “Qwest had in place at the time of filing this application a complete, comprehensive, and forward-looking change management plan.”³ When Qwest filed its Qwest III application on September 30, every element of the CMP Framework was in place and implemented, with only consistency and other details to be worked out at the final redesign session, which was held on October 8 and 9, 2002. The CLECs and Qwest have now completed the entire process, and the final CMP Framework was issued on October 15, 2002. A copy of the final CMP Framework is attached to this declaration as Reply Exhibit DLF-1, and may be found on the Qwest wholesale website at <http://www.qwest.com/wholesale/cmp/whatiscmp.html>.

4. Each of the CMP Declarations filed in Qwest I and Qwest II contains a description of the status of the redesign process discussions as of the date each declaration was filed.⁴ Since August 26, when the Reply Comments in Qwest

² Qwest I CMP Decl. at ¶¶ 9-20; Qwest CMP II Decl. at ¶¶ 9-20.

³ Qwest I CMP Reply Decl. at ¶ 4.

⁴ Qwest I CMP Decl. at ¶¶ 13-17; Qwest II CMP Decl. at ¶¶ 13-17. *See also* Qwest I CMP Reply Decl. at ¶¶ 16-20; Qwest II Reply CMP Decl. at ¶¶ 15-19.

II were filed, CLECs and Qwest have agreed to certain minor changes in the procedures governing the Exception Process (Section 16 of the CMP Framework). They also agreed upon an Oversight Review Process for handling issues with the CMP and CMP compliance (Section 18 of the CMP Framework), which was incorporated into the CMP Framework on September 13, 2002.⁵ Under the Oversight Review Process, CLECs or Qwest may identify an issue for oversight review by presenting it at a monthly CMP meeting or by e-mail. The issue will then be addressed by the relevant carrier, with notification of the issue and the response provided to CLECs and posted on the Qwest wholesale CMP website. The issue also may be referred to an Oversight Review Committee, which consists of one Qwest representative, a representative from each of up to six CLECs, and a representative from any state commission that chooses to participate. The Committee may make recommendations, which will be posted to the Qwest wholesale CMP website and considered at the next CMP monthly meeting.

5. As of September 30, when the Qwest III application was filed, only small details remained to be discussed in the redesign process. These included consistency and other clean-up changes to the definition of industry guideline changes, to the procedures for Level 2 product and process changes, and to the

⁵ The Oversight Review Process fully addresses concerns raised by Eschelon, in its Qwest II Comments at 43, about Qwest's continued compliance with CMP. *See also* Qwest II CMP Reply Declaration at ¶ 38.

exception process. As noted above, these remaining items were taken care of at the final redesign session, held on October 8 and 9. Now that the collaborative redesign effort is over, future proposed changes will be discussed and decided by Qwest and the CLECs through a procedure set forth in the CMP Framework, Section 2.1.⁶ Of course, the CMP monthly meetings to discuss change requests and other such matters under the established change management process will continue to be held, as provided by the CMP Framework, Section 3.

III. PATTERN OF COMPLIANCE WITH THE CHANGE MANAGEMENT PROCESS

6. In Qwest I and Qwest II, several CLEC commenters claimed that Qwest has not demonstrated a pattern of compliance with its CMP plan, contending that it has not had sufficient time to show a pattern over time. In its comments on the refiled applications, AT&T specifically reiterates this claim, referencing its earlier filings.⁷ As discussed in detail in the Qwest I and Qwest II CMP Declarations, however, Qwest has established a strong pattern of compliance over time with the redesigned CMP.⁸ This strong pattern of compliance has continued. Attached to this declaration is an updated version of the Change

⁶ See also Qwest II CMP Decl. at ¶ 20.

⁷ AT&T Qwest III Comments, 50 n.168.

⁸ Qwest I CMP Decl. at ¶¶ 143-172; Qwest II CMP Decl. at ¶¶ 143-172.

Management Improvements Matrix, through September 30, 2002.⁹ To summarize the results of that matrix, I repeat here the summary of Qwest's compliance set forth in the Qwest I and Qwest II CMP Declarations,¹⁰ updated through September 30:

- In processing OSS Interface CRs, Qwest has met more than 99% of its commitments (since November 1, 2001).
- In processing CLEC-initiated product and process CRs, Qwest has met more than 98% of its commitments (since November 1, 2001).
- In processing Qwest-initiated Level 4 product and process CRs, Qwest has met 100% of its commitments. And in processing Qwest-initiated product and process notification requirements for Level 1, Level 2, Level 3, and Level 4 changes, Qwest has met more than 99% of its commitments. (Both since April 1, 2002).
- In introducing a new graphical user interface ("GUI"), Qwest has met 100% of the milestones (since November 1, 2001).
- In changing an application-to-application interface, Qwest has met 100% of the milestones (since November 1, 2001).
- In changing a GUI, Qwest has met 100% of the milestones (since November 1, 2001).

⁹ Reply Exhibit DLF-2. The Change Management Improvements Matrix was attached to both the initial and reply declarations in Qwest I and Qwest II. See Qwest I CMP Decl., Exhibit DLF-CMP-5; Qwest I Reply CMP Decl., Reply Exhibit JMS-7; Qwest II CMP Decl., Exhibit DLF-CMP-5; Qwest II CMP Decl., Reply Exhibit DLF-3. As noted in the CMP Declarations, the matrix was prepared by my staff and indicates Qwest's compliance with agreed-upon timeframes and deliverables in the CMP Framework and its implementation of the CMP on a section-by-section basis. See Qwest I CMP Decl. at ¶ 144; Qwest II CMP Decl. at ¶ 144.

¹⁰ Qwest I CMP Decl. at ¶ 144; Qwest II CMP Decl. at ¶ 144.

- In retiring an existing graphical user interface, Qwest has met 100% of the milestones (since November 2001).
- In issuing production support planned outage notifications, Qwest has issued 100% on a timely basis (since February 2002).
- In processing escalations, Qwest has met nearly 98% percent of its commitments (since November 16, 2001).
- In issuing OSS interface release notifications, Qwest has issued 100% on a timely basis (since April 4, 2002).

7. The Department of Justice concluded that Qwest had demonstrated a pattern of compliance with its CMP over time in its evaluations of both Qwest I and Qwest II. It incorporated by references these views in its evaluation of the Qwest III application.¹¹ As the Department said in Qwest II, “[n]othing in the record of Qwest’s second multistate application leads the Department to revise its conclusions [in Qwest I] that Qwest’s redesigned CMP is sufficient to determine and implement necessary changes to its OSS and that its record of compliance is adequate.”¹²

IV. NOTIFICATION ISSUES

8. In its reply comments in the Qwest II proceeding, WorldCom cites isolated instances of alleged noncompliance with CMP procedures as a basis

¹¹ Department of Justice Qwest III Evaluation at n.3.

¹² Department of Justice Qwest II Evaluation at 18 n. 89. *See also* Department of Justice Qwest I Evaluation, July 23, 2002, at 26.

for concluding that Qwest has not demonstrated a pattern of compliance.¹³ I address these claims below. I have addressed the other CLEC allegations of noncompliance with CMP procedures in the Qwest I and Qwest II change management declarations and reply declarations.¹⁴ Only one out of all of these instances involved any violation of the change management procedures. That involved a trouble report that led to discovery of a defect associated with the IMA requirement to complete a directory listing form for UNE-P Centrex 21 orders (discussed below). But even if every one of the commenters' allegations were true, the existence of isolated instances of noncompliance with CMP would not be sufficient to undercut the very strong overall pattern of compliance Qwest has demonstrated with its redesigned CMP.¹⁵ In addition, I note that the Qwest has met the benchmark for the relevant PID (PO-16, measuring the timeliness of release notifications) each of the past four months ending with August.¹⁶

¹³ WorldCom Qwest II Reply Comments at 13-15.

¹⁴/ Qwest I CMP Declaration at ¶ 154- 155; Qwest I CMP Reply Declaration at ¶¶ 22-40; Qwest II CMP Declaration at ¶¶ 154-155; Qwest II CMP Reply Declaration at ¶¶ 21-40.

¹⁵ See, e.g., *Georgia/Louisiana 271 Order* ¶ 172 n.644 (finding that anecdotal evidence was not enough given that “review of the record does not indicate a systemic or discriminatory problem”); *Kansas/Oklahoma 271 Order* ¶ 281.

¹⁶ Qwest III Brief, Att. 5, App. D, Regional Commercial Performance Results at 99 (PO-16).

9. First, WorldCom points to Qwest's decision that CLECs no longer have to submit features on orders for customers choosing not to retain those features.¹⁷ WorldCom appears to be referring to a Level 1 CMP Process Notification distributed on August 15, 2002.¹⁸ The purpose of this notification was to clarify that if a CLEC did not wish to retain an existing feature on a migration order then the CLEC could either leave the field next to the feature blank or enter a "D" in that field. This notification did not change the pre-existing process. As specified in Section 5.4.2 of the CMP Framework, "corrections/clarifications/additional information that do not change the product/process" are appropriately noticed as Level 1 changes, which do not require prior notice to CLECs. Thus there was no CMP violation in this case.

10. Second, WorldCom cites Qwest's release of a "web change notification form stating that resale remote call forwarding would not flow through."¹⁹ WorldCom's statements appear to refer to a Level 1 CMP Process Notification distributed on August 16, 2002.²⁰ The purpose of this notification, as stated in the notification, was:

¹⁷ WorldCom Qwest II Reply Comments at 13-14, citing Qwest I/II ex parte 081302a.

¹⁸ PROS.08.15.02.F.00544.LSOG 5 Updates (Reply Exh. DLF-3).

¹⁹ WorldCom Qwest II Reply Comments at 14.

²⁰ PROS.08.16.02.F.00548.Ordering Overview, Reply Exh. DLF-4.

Clarification regarding Local Service Request (LSR) System Flowthrough for Resale Remote Call Forwarding (RCF) that does not change the process. This clarification identifies specific instances during which RCF is an exception to LSR Flow Through within the Interconnect Mediated Access (IMA) System.²¹

Prior to issuance of this notification, Resale Remote Call Forwarding was, in fact, listed as an Exception to Flow Through. As is clear from the language of the notification itself, this notification did not change the process. Rather, it simply provided a greater level of specificity. Pursuant to Section 5.4.2 of the CMP Framework, Qwest correctly issued this notification as a Level 1 change, which, as noted above, does not require advance notice.²²

11. WorldCom also points to a number of allegations made by Eschelon of failure to issue the proper notifications under change management procedures.²³ Qwest has already fully addressed, in its Qwest II Reply Comments, the allegation regarding an alleged defect in Release 10.0 involving CLEC-CLEC migration orders.²⁴ I address each of the other Eschelon allegations cited by WorldCom below.

²¹ *Id.*

²² CMP Framework, § 5.4.2.

²³ WorldCom Qwest II Reply Comments at 14-15, citing Eschelon Telecom, Inc, Ex parte Comments in Qwest I (August 15, 2002).

²⁴ Qwest II Reply CMP Declaration at ¶ 34. See WorldCom Qwest II Reply Comments at 14, citing Eschelon August 15, 2002, Ex Parte in Qwest I at 21-23.

12. First, WorldCom points to Eschelon's allegations of Qwest "non-compliance with several CMP processes" in connection with the requirement under Interconnect Mediated Access (IMA) that CLECs complete a directory listing form for Centrex 21 orders, beginning in August, 2002.²⁵ Eschelon claims that "no notice of CLEC affecting work by Qwest" was provided by Qwest. Since the IMA 7.0 Release, it has been Qwest's documented process to *require* a Directory Listing (DL) Form for UNE-P Centrex 21 requests with an activity of C (Change). This practice did not change in August. However, a DL Form is *optional* for Resale Centrex 21 requests with an activity of C. Therefore, if a CLEC placed a request for Resale Centrex 21 with an activity of C, and did not complete the DL Form, the request would not receive an error message, whereas a similar request for UNE-P Centrex 21 would result in an error message. This difference may have led Eschelon to the incorrectly conclude that Qwest had made a change to IMA. Qwest acknowledges that this is a design defect which will be corrected with the IMA 11.0 Release. Eschelon also claims that "no severity level noticed" in connection with its trouble report. Qwest's records indicate, however, that Peter Stave of Eschelon was advised that the trouble ticket was assigned a Severity 3 rating. Eschelon further states that no event notification was issued even though more than one CLEC was affected. On this point Eschelon is correct; because multiple CLECs could be

²⁵ WorldCom Qwest II Reply Comments at 14-15, citing Eschelon August 15, 2002, Ex Parte in Qwest I at 25-26.

affected by the trouble, Qwest should have issued an event notification. Qwest expects to issue such a notification on or before October 25. Eschelon also asserts that “no status updates per production support intervals” were given. In fact, Qwest’s records show that Qwest provided Eschelon nine timely status updates for this trouble ticket, and on only one occasion failed to provide Eschelon the regular 48-hour notice of no change in status.²⁶ Finally, in connection with the same trouble, Eschelon claims that there was no “collaborative approach to workaround.” On the contrary, however, Qwest’s records indicate that on August 8, 2002, it left a voice mail message for Eschelon’s Mr. Stave that described the workaround, and on August 12, the workaround was discussed with him.²⁷ In sum, in connection with this Eschelon trouble report, Qwest concededly failed to provide an event notification to all CLECs and failed to issue one no-change status notification to Eschelon, but otherwise complied with all of the applicable CMP requirements.

²⁶ Qwest’s records show that between August 2, 2002, when the trouble was initially reported, and August 19, Qwest had contact with Eschelon on nine occasions. On August 19, Mr. Stave stated that he would let Qwest know whether it was OK to close the trouble ticket once he checked with Bonnie Johnson, also of Eschelon. On August 30, Mr. Stave instructed Qwest to leave the trouble ticket open and indicated that there was no need for further contact with Eschelon until the defect is corrected. It appears that Qwest may have failed to contact Eschelon, to inform it that there was no change in status, on one occasion prior to August 30. The trouble ticket was closed on September 26.

²⁷ WorldCom Qwest II Reply Comments at 15, citing Eschelon August 15, 2002, Ex Parte in Qwest I at 25-26.

13. Eschelon next argues that Qwest violated its CMP procedures in failing to notify CLECs that it was making changes to the service order processor to eliminate the possibility of erroneous dispatch for migration orders.²⁸ In the cited situation, as discussed in Qwest's OSS Reply Declaration in Qwest II, Qwest determined that there was a problem with one of its internal processes.²⁹ Qwest fixed the internal process and the problem appears to have been resolved. There is no Change Management issue here, as no change was made to Qwest's OSS interfaces with the CLECs, its products, or its processes.

14. Finally, WorldCom cites Eschelon's argument that Qwest failed to provide CLECs notice when it conducted an alleged internal "clean-up" effort to address double billing of USOCs left on converted accounts.³⁰ Eschelon's claim is vague and unsupported by dates or other facts. Thus, Qwest is not able to respond to it.

15. In sum, with the exception of Eschelon's trouble report on Centrex 21, none of the instances cited by the CLECs constitute violations of CMP procedures. The two CMP violations associated with that trouble report are minor and isolated in nature, and thus do not undermine a finding that Qwest's change

²⁸ WorldCom Qwest II Reply Comments at 15, citing Eschelon August 15, 2002, Ex Parte in Qwest I at 32.

²⁹ Qwest II OSS Reply Decl. at ¶247. *See also* Qwest II CMP Reply Decl. at ¶37.

management process, and its compliance with that process, satisfies the requirements of Section 271.

16. This concludes my declaration.

³⁰ WorldCom Qwest II Reply Comments at 15, citing Eschelon August 15, 2002, Ex Parte in Qwest I at 36.